<u>REMARKS</u>

Claims 1-28 and 31-38 are pending in the present application. By this Response, claims 1, 19 and 37 are amended to recite the features of parsing a document to determine semantic characteristics in the document and generating semantic tags corresponding to the semantic characteristics in the document to form a semantically tagged document. Support for this amendment can be found at least on page 20, line 21-page 22, line 2 of the present specification. Additionally, claims 15, 16, 18, 33, 34, 36 and 38 are amended for clarification purposes. Reconsideration of the claims is respectfully requested.

I.   **35 U.S.C. § 103, Alleged Obviousness of Claims 1-2 and 7-14**

The Office Action rejects claims 1-2 and 7-14 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Smith et al (Transcoding Internet Content for Heterogeneous Client Devices) in view of Motoyama (U.S. Patent No. 5,848,386). This rejection is respectfully traversed.

With regard to claim 1, the Office Action states:

> Smith et al teach a transcoder processing system implemented method for converting documents based on semantic characteristics, comprising (figure 1, his Internet content Transcoding system, pages III-599 to III-602):
> "Receiving a request for a document client" (his client device, page III-599, section 2, His Internet content transcoder, a policy engine gathers the capabilities of the client, the networks conditions and the Transcoding preference of the user and publisher)'
> "Passing the request to an origin server" (the request from the client server is passed to the publisher (server));
> "Performing a syntactical Transcoding on the request document wherein at least one semantic at least one semantic characteristic of the request document is converted" (figure 1, his Internet content transcoder, Section 2, page III-599, the system selects the outputting versions of the contents and uses a library of content analysis, filtering translation and manipulation routines to generate the content to be delivered to the client); and
> "Sending the requested document to the client" (the system is able to retrieve the Internet content, analyze and transcode it and deliver it to the client, III-599-III-600).
> It is noted that Smith teaches the claimed invention but does not explicitly teach determining information regarding each semantic

characteristic of a requested document wherein the information regarding each semantic characteristic is contained with a semantic tag in the requested document. However, this feature is well known in the art as evidenced by Motoyama et al who teach a system for translating a document form a first language to another language using different translation resources depending on the document portion being translated wherein each portion is tagged using a semantic tag at the abstract, figure 7 and col. 8, lines 60 to col. 9, line 15. Therefore, one having ordinary skill in the art at the time the invention was made would have it obvious to incorporate into the Transcoding system of Smith the semantic tag using different translation resources as taught by Motoyama because it would provide an accurate transcoder where semantic is taking into consideration.

Office Action dated December 31, 2003, pages 2-4.

Claim 1, which is representative of claims 19 and 37 with regard to similarly recited subject matter, reads as follows:

1. A transcoder processing system implemented method for converting documents based on semantic characteristics, comprising:
    parsing a document to determine semantic characteristics in a document;
    generating semantic tags corresponding to the semantic characteristics in the document to form a semantically tagged document;
    receiving a request for a document from a client;
    passing the request to an origin server;
    receiving the semantically tagged document corresponding to the requested document from the origin server;
    parsing the semantically tagged document corresponding to the requested document to locate semantic tags in the document;
    performing a syntactical transcoding on the semantically tagged document corresponding to the requested document, wherein at least one semantic characteristic corresponding to a semantic tag in the semantically tagged document is converted based on the information regarding each semantic characteristic of the semantically tagged document; and
    sending the converted document with the at least one converted semantic characteristic to the client. (emphasis added)

In the Response to Office Action filed on October 20, 2003, the remarks of which are hereby incorporated by reference, Applicants argued that Smith does not teach that information regarding each semantic characteristic is contained within a semantic tag in the requested document. In fact, nowhere does Smith teach the use of semantic tags. The Office Action admits that Smith does not teach this feature. The Office Action, however,

alleges this feature is taught in Motoyama. While Applicants do not necessarily agree with the Office Action, Applicants have amended independent claims 1, 19 and 37 to recite the feature of parsing a document to determine semantic characteristics in the document and generating semantic tags corresponding to the semantic characteristics in the document to form a semantically tagged document. This feature is not taught by either of Smith and Motoyama.

As discussed above, Smith does not teach semantic tags, let alone parsing a document to determine semantic characteristics in the document and generating semantic tags corresponding to the semantic characteristics in the document. Motoyama is directed to a system for translating a document from one natural language to another, different natural language. Information contained within an original document is encoded using Standard Generalized Markup Language (SGML) or the like. The SGML tags contain information used to indicate different sections of the document as well as other information pertaining to the document, for example, the language of the document. SGML code is parsed to determine the different sections of the document, and also determine the context of the phrases and sentences in the document. An electronic dictionary is then used to translate the language of the original document to a different language. While Motoyama may teach parsing SGML code <u>to determine information related to a document</u> that is to be translated, there is nothing in Motoyama that teaches or suggests parsing a document to determine semantic characteristics in the document and generating semantic tags corresponding to the semantic characteristics in the document.

In other words, Motoyama does not teach determining information regarding semantic characteristics by parsing a document and then generating semantic tags according to the information retrieved from parsing document. Motoyama teaches nothing about generating semantic tags, let alone parsing a document to determine semantic characteristics for the purpose of generating semantic tags. The SGML tags in Motoyama are not generated upon determination of the semantic characteristics of the document. Rather, the tags exist in the original document prior to being processed by the system described in Motoyama. The existing tags are processed to determine the information contained within. The information is then used to translate the document from a first language to a second language. However, in Motoyama, a semantic tag is not

generated in response to a determination of the semantic characteristic information in the requested document.

In view of the above, Applicants submit that neither Smith nor Motoyama, either alone or in combination, teaches or suggests each and every feature of independent claims 1, 19 and 37. At least by virtue of their dependency on claims 1, 19 and 37, neither Smith nor Motoyama, either alone or in combination, teaches or suggests each and every feature of dependent claims 2-14, 20-28, 31 and 32. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-14, 19-28, 31, 32 and 37 under 35 U.S.C. § 103(a).

Furthermore, for the same reasoning as set forth in the Response to Office Action filed on October 20, 2003, claims 7, 8, 25 and 26 are also patentable over Smith by virtue of the specific features recited therein. That is, Smith does not teach or suggest that a semantic characteristic preference specified by the client is conformance with specified governmental regulations by the requested document as recited in claims 7 and 25. Similarly, Smith does not teach or suggest that at least one semantic characteristic is the conformance with specified governmental regulations of the requested document as recited in claims 8 and 26.

In rejecting claims 7, 8, 25 and 26, the Examiner maintains that this feature is taught in Smith's "policy engine, page III-601", wherein "the transcoding proxies generates and selects versions of the content according to policies (government regulations))." (Office Action, page 4) Applicants reiterate that a policy engine is not related to governmental rules and regulations. Rather, it is a mechanism to determine and solve various network issues based on an established policy. A policy is a set of rules for the transcoder to follow when handling network traffic. This is a known definition to one of ordinary skill in the art and thus, the Examiner has interpreted the meaning of a policy, in this context, incorrectly. Moreover, a review of section 4.1 of Smith, which is reproduced below, will confirm the assertions made by Applicants regarding the definition of a policy and a policy engine:

> The policy engine would gather the capabilities of the client and the transcoding preferences of the user and publisher, and sense the network conditions to define the transcoding options for the client. In

order adapt the Internet content to these devices, the transcoding proxy
generates and selects versions of the content according to policies,
network and device constraints, and preferences. (emphasis added)

The policy engine in Smith has absolutely nothing to do with government regulations.
There is nothing in section 4, or anywhere else in the Smith reference for that matter that
has any thing to do with government regulations.

In addition, Motoyama does not provide for the deficiencies of Smith. As set
forth above, Motoyama is concerned with translating a document, written in one
language, to another language. The translation does not occur based on any government
regulations. In fact, nowhere do the phrases "government regulations", "government
policies" or anything synonymous with these phrases occur in Motoyama. This is
because Motoyama does not place the restriction that a document must adhere to
government standards in order to be translated. Therefore, Applicants respectfully
submit that neither Smith nor Motoyama, either alone or in combination, teaches or
suggests the features of claims 7, 8, 25 and 26.

II.   35 U.S.C. § 103, Alleged Obviousness of Claims 3-4 and 5-6

The Office Action rejects claims 3-4 and 5-6 under 35 U.S.C. § 103(a) as being
allegedly unpatentable over Smith et al (Transcoding Internet Content for Heterogeneous
Client Devices) in view of Motoyama (U.S. Patent No. 5,848,386) and in further view of
Yamauchi et al (U.S. Patent No. 5,701,497). This rejection is respectfully traversed for at
least the same reasons as set forth above with regard to independent claim 1 from which
claims 3-4 and 5-6 depend.

Specifically, neither Smith nor Motoyama, either alone or in combination, teach
or suggest parsing a document to determine semantic characteristics in the document and
generating semantic tags corresponding to the semantic characteristics in the document.
In addition, Yamauchi does not provide for the deficiencies of Smith and Motoyama.
That is, Yamauchi also does not teach or suggest parsing a document to determine
semantic characteristics in the document and generating semantic tags corresponding to
the semantic characteristics in the document.

Yamauchi is directed toward a system for faxing a document and translating the document from a first language to a second, different language prior to displaying the document on the receiving end. Yamauchi employs optical character recognition to convert the characters from one language into a code. The code is used to look up the corresponding words of the target language in a plurality of dictionaries. The system recognizes the language of the original document by first recognizing the country code of the telephone number of the calling terminal. Since this may be error prone, Yamauchi also scans part of the document and compares the characters to each of the different language dictionaries until there is a match. The first language is translated into a second different language specified in an administration table. While Yamauchi may teach converting a document from one language to another, there is nothing in Yamauchi that teaches or suggests parsing a document to determine semantic characteristics in the document and generating semantic tags corresponding to the semantic characteristics in the document.

In addition, claims 5, 6, 23 and 24 are patentable over Smith, Motoyama and Yamauchi by virtue of the features recited therein. Specifically, neither Smith, Motoyama nor Yamauchi, either alone or in combination, teach or suggest that a semantic characteristic preference specified by the client is locale as recited in claims 5 and 23. Similarly, neither Smith, Motoyama nor Yamauchi, either alone or in combination, teach or suggest that at least one semantic characteristic is the locale characteristic of the requested document as recited in claims 6 and 24.

The Office Action admits that Smith does not teach this feature. However, it is unclear whether the Examiner is referring to Motoyama or Yamauchi as allegedly teaching this feature. The Office Action alleges that the various English-Japanese dictionaries used in the translation system depend on locale. (Office Action, pages 5-6) Since both Motoyama and Yamauchi teach using an English-Japanese dictionary, Applicants assume that the Examiner is relying on both references equally.

In either case, a dictionary, which translates one language to another in no way, reflects the locale of the requested document. For example, a Japanese speaking individual may wish to create a document in English, thus would use a Japanese-English dictionary. If this individual resides in a country other than Japan or a primarily English

speaking country, one cannot determine the locale simply based on the language in the dictionary. Thus, a dictionary tells nothing about where the document originated from, in other words, its locale. In Yamauchi, for example, suppose the Japanese speaking individual resides in France and wishes to fax a document to the United States. The dictionary that would be used, most likely, is a Japanese-English dictionary. However, the locale of the document is France. Thus, merely teaching a dictionary that translates languages in no way obviates the locale of the document.

III. Rejection of Claims 15-38

The Office Action rejects claims 15-38 by alleging that they are in the same scope and content as claims 1-14. This rejection is respectfully traversed.

Claim 15, which is representative of claim 33 with regard to similarly recited subject matter, reads as follows:

> 15. A transcoder processing system implemented method for converting documents based on semantic characteristics, comprising:
> receiving at least one semantic characteristic preference from a client wherein the semantic characteristic preference is selected from the group including, locale and compliance with government regulations;
> syntactically transcoding a document; and
> converting at least one of the semantic characteristics of the document, wherein converting is based on the at least one semantic characteristic preference. (emphasis added)

For the same reasons as set forth above regarding the discussion of semantic characteristics, including locale and government regulations, neither Smith, Motoyama nor Yamauchi, either alone or in combination, teach or suggest that a semantic characteristic preference is selected from the group including locale and compliance with government regulations. As noted above with regard to claims 5, 6, 23 and 24, which recite the feature of locale as a semantic characteristic, the English-Japanese dictionary in Motoyama and Yamauchi in no way obviates locale as a semantic characteristic. In addition, claims 7, 8, 25 and 26 teach the feature of using compliance with government

regulations as a semantic characteristic. The Examiner alleges this is taught in Smith because the "transcoding proxies generates and selects versions of the content according to policies (governmental regulations)." As noted above, a policy engine is not related to governmental rules and regulations. Rather, it is a mechanism to determine and solve various network issues based on an established policy.

Claim 18, which is representative of claims 36 and 38 with regard to similarly recited subject matter, reads as follows:

> 18. A transcoder processing system implemented method for converting documents based on semantic characteristics, comprising:
>   requesting a document from an origin server from a client;
>   transmitting at least one semantic characteristic preference from a client, wherein the at least one semantic characteristic preference is one of locale and compliance with governmental regulations; and
>   receiving the document, wherein the document has been syntactically transcoded and converted using the at least one semantic characteristic preference. (emphasis added)

For the same reasons as noted above, neither Smith, Motoyama nor Yamauchi, either alone or in combination, teaches or suggests that at least one semantic characteristic preference is one of locale and compliance with governmental regulations. Specifically, the argument set forth with regard to claims 15 and 33 apply equally to claims 18, 36 and 38.
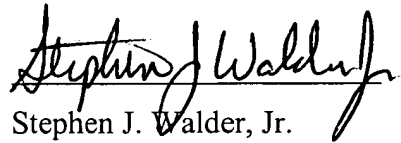
In view of the above, Applicants submit that neither Smith, Motoyama nor Yamauchi, either alone or in combination, teaches or suggests each and every feature of independent claims 15, 18, 33, 36 and 38. At least by virtue of their dependency on claims 15 and 33, neither Smith, Motoyama nor Yamauchi, either alone or in combination, teaches or suggests each and every feature of dependent claims 16, 17, 35 and 35. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 15-18, 33-36 and 38 under 35 U.S.C. § 103(a).

IV.   Conclusion

It is respectfully urged that the subject application is patentable over Smith, Motoyama and Yamauchi and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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